| 1 2 | JONES, SKELTON & HOCHULI, P.L.C. |
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| 3 | Telephone: (602) 263-1700 Fax: (602) 200-7814 wcaravetta@jshfirm.com |
| 5 | Attorneys for Defendant Sentinel Insurance |
| 6 | Company, Ltd. |
| 7 | UNITED STATES DISTRICT COURT |
| 8 | DISTRICT OF ARIZONA |
| 9 | Scottsdale Condo-Business Center NO. TBD |
| 10 | Association, Inc., |
| 11 | Plaintiff, NOTICE OF REMOVAL |
| 12 | v. |
| 13 | Sentinel Insurance Company, Ltd., |
| 14 | Defendant. |
| 15 | |
| 16 | |
| 17 | Defendant, Sentinel Insurance Company, Ltd. (hereinafter "Defendant"), by |
| 18 | and through undersigned counsel, files this Notice of Removal of this action to the United |
| 19 | States District Court for the District of Arizona and states as follows: |
| 20 | 1. On or about August 7, 2013, Plaintiff filed its Complaint against |
| 21 | Defendant in the Superior Court of the State of Arizona, in and for the County of |
| 22 | Maricopa, under the caption "Scottsdale Condo-Business Center Association, Inc. v. |
| 23 | Sentinel Insurance Company, Ltd" A copy of the initial pleadings are attached hereto as |
| 24 | Exhibit A. Defendant Sentinel Insurance Company, Ltd. was served with the Summons |
| 25 | and Complaint via The State of Arizona Department of Insurance on August 8, 2013. |
| 26 | 2. Defendant Sentinel Insurance Company, Ltd. is a foreign corporation |
| 27 | with its principal place of business in Hartford, Connecticut. According to the Complaint, |
| 28 | |
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| 1 | Plaintiff is domiciled in Maricopa County, Arizona. |
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| 2 | 3. Upon information and belief, this Court has original jurisdiction over |
| 3 | the civil action pursuant to 28 U.S.C. § 1332 in that the matter in controversy exceeds the |
| 4 | sum or value of \$75,000 exclusive of interest and costs, and the action is between citizens |
| 5 | of different states. As such, this action may be removed to this Court pursuant to the |
| 6 | provision of 28 U.S.C. § 1441, et seq. |
| 7 | 4. This Notice of Removal is filed within thirty (30) days after service |
| 8 | of the Complaint and is therefore timely filed under 28 U.S.C. § 1446(b). |
| 9 | 5. Written notice of the filing of this Notice of Removal will be given to |
| 10 | all adverse parties as required by law and a true and correct copy of this Notice will be |
| 11 | filed with the Clerk of the Superior Court of the State of Arizona, in and for the County of |
| 12 | Maricopa. |
| 13 | 6. A Notice of Filing Notice of Removal was filed with the Maricopa |
| 14 | County Superior Court and a copy of the same is attached hereto as Exhibit B. |
| 15 | WHEREFORE, Defendant respectfully requests that this action be removed |
| 16 | to this Court. |
| 17 | |
| 18 | DATED this 21 st day of August, 2013. |
| 19 | JONES, SKELTON & HOCHULI, P.L.C. |
| 20 | |
| 21 | By: /s/William G. Caravetta, III |
| 22 | William G. Caravetta, III 2901 North Central Avenue, Suite 800 |
| 23 | Phoenix, Arizona 85012 Attorneys for Defendant Sentinel Insurance |
| 24 | Company, Ltd. |
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| 1 | Certificate of Service |
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| 2 | I hereby certify that on the date stated above, a copy of the foregoing has |
| 3 | been transmitted electronically to the CM-ECF filing system for filing and transmittal |
| 4 | along with copies transmitted to the following parties via the CM-ECF system. |
| 5 | Monica K. Lindstrom |
| 6 7 | Merlin Law Group, P.A. 8300 N. Hayden Road, Suite A207 Scottsdale, AZ 85258 |
| 8 | Counsel for Plaintiff |
| 9 | s/Michelle L. Lucas |
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